

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk-Newport News Division**

<b>TATYANA A. BABAKAEVA,</b>	:	
	:	
<b>Plaintiff,</b>	:	
	:	
<b>v.</b>	:	<b>Civil Action No.: 4:11-cv-78</b>
	:	
<b>ROBERT P. QUADROS, ESQ.</b>	:	
	:	
<b>and</b>	:	
	:	
<b>RAYMOND BACON, ESQ.,</b>	:	
	:	
<b>and</b>	:	
	:	
<b>QUADROS &amp; ASSOCIATES, P.C.,</b>	:	
	:	
<b>Defendants.</b>	:	

**MEMORANDUM IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL AND  
SUBSTITUTE COUNSEL**

COMES NOW, Joseph M. Young, Esq. and Rutter Mills, L.L.P., pursuant to Local Rule 7 and Local Rule 83.1 (G) of the Local Rules of the United States District Court for the Eastern District of Virginia, and file this Memorandum in Support of the Motion to Withdraw as Counsel and Substitute Counsel, stating as follows:

This case was filed on or about May 11, 2011 and involves a myriad of claims presented by the pro se Plaintiff against the individual Defendants and Defendants' law firm. Defendants were served on or about August 31, 2011 and September 7, 2011 respectively. The undersigned filed an Answer on behalf of all Defendants on or about September 19, 2011 and is currently is listed as counsel for Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. On October 11, 2011, Mary T. Morgan, Esq., an attorney licensed in the Commonwealth of Virginia

and admitted to practice before this Court, filed an Appearance of Counsel for Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. Pursuant to Local Rule 83.1 (G), reasonable notice has been given to Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. have consented to the substitution of Mary T. Morgan, Esq. and Cooper, Spong & Davis, P.C. and have endorsed a proposed Consent Order Granting Substitution of Counsel. No prejudice will occur with respect to Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. if this Court grants this motion. A copy of this motion will be served upon Plaintiff at her last known address of 2124 Criston Drive, Newport News, Virginia 23602. The original proposed Consent Order Granting Substitution of Counsel has been endorsed by Robert P. Quadros, individually and on behalf of Quadros & Associates, P.C., Raymond Bacon, Mary T. Morgan, Esq. and the undersigned will be submitted to the Court in accordance with the E-Filing Policies and Procedure Manual.

WHEREFORE, Joseph M. Young, Esq, and the law firm of Rutter Mills, L.L.P. respectfully request that this Court permit them to withdraw as counsel for Robert P. Quadros, Raymond Bacon and Quadros & Associates, P.C. and substitute Mary T. Morgan, Esq. and the law firm of Cooper, Spong & Davis, P.C. as counsel of record.

Date: October 19, 2011

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/s/  
Joseph M. Young  
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**CERTIFICATE**

I hereby certify that on the 19th day of October, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system and will send a true and accurate copy via U.S. Mail, first class, postage pre-paid to the following:

Tatyana A. Babakaeva  
2124 Criston Drive  
Newport News, Virginia 23602  
*Pro se Plaintiff*

\_\_\_\_\_/s/\_\_\_\_\_  
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*Counsel for Defendants Robert P.  
Quadros, Raymond Bacon and  
Quadros & Associates, P.C.*